

## CHAPTER 70. EVALUATE PARTS 91 SUBPART K/121/135.411(a)(2) MAINTENANCE TRAINING PROGRAM/RECORD

### SECTION 1. BACKGROUND

#### 1. PROGRAM TRACKING AND REPORTING SUBSYSTEM (PTRS) ACTIVITY CODES.

A. *Maintenance:* 3633

B. *Avionics:* 5633

**2. OBJECTIVE.** This chapter provides guidance for evaluating and accepting an operator/applicant's or fractional program manager's (hereafter referred to as the program manager) maintenance/inspection training program.

**3. GENERAL.** Effective training is the basis for a successful maintenance/inspection program. Although many procedures for maintaining and inspecting aircraft may be similar, the equipment, procedures, and task documentation used may all be unique to the operator/program manager/applicant's specific programs.

A. Title 14 of the Code of Federal Regulations (14 CFR) part 91 (subpart K) and part 135 may require, and parts 121 and 145 do require, that maintenance/inspections be performed in accordance with the operator/applicant's or program manager's manual.

B. Maintenance/inspection training programs are the most efficient manner to inform personnel of the requirements of the operator/applicant's or program manager's program.

**4. COORDINATION REQUIREMENTS AND SCHEDULING.** Aviation safety inspectors (ASI) should encourage applicants to discuss pending maintenance/inspection training program development with the certification team before the program is submitted for final acceptance. It is especially important that programs be reviewed for conformity with appropriate regulatory requirements. This review can reduce the number of major changes an operator will have to make after a program has been printed and distributed.

**5. SCHEDULING MAINTENANCE TRAINING PROGRAMS.** Delays in program acceptance results in delays in the certification process, or in the case of fractional ownership programs, delays in issuance of management specifications (MSpecs). To facilitate the evaluation of the training programs, the applicant should be encouraged to schedule a classroom training session in a timely manner.

**6. CONTENT OF MAINTENANCE/INSPECTION TRAINING PROGRAMS.** The program manager's Continuous Airworthiness Maintenance Program (CAMP) or operator/applicant's training program should include company indoctrination and technical training (formal and on-the-job training (OJT)). The program should contain a list of tasks to be taught and a method for recording the training. Completion of the training must be entered in the individual's training record.

A. *Company Indoctrination.* Each maintenance/inspection employee should receive instruction in the use of the operator/program manager/applicant's manuals, policies, procedures, and forms.

B. *Maintenance/Inspection Technical Training.*

(1) Training may consist of a combination of formal (classroom) instruction and OJT. The operator/program manager/applicant may give training credit to individuals for experience gained while employed by other operators/program managers.

(2) Procedures unique to the operator/program manager/applicant should be taught. Training records should indicate the amount of formal training, OJT, and experience each individual receives.

(3) Technical training may be contracted to another operator, manufacturer, or in the case of a specialized process, to a person knowledgeable in that specialized process. The operator/program

manager/applicant is responsible for the content and quality of such training.

(4) The Federal Aviation Administration (FAA) does not establish a fixed amount of time for indoctrination or technical training courses, but the courses should use a minimum time proportional to the operator/program manager/applicant's complexity.

*C. Responsibilities for Persons Other than an Operator/Program Manager's Employees.* Part 121 requires each certificate holder to be primarily responsible for having a training program and ensuring that the training received throughout the operator/program manager's system is of equal quality and effectiveness. This covers all persons such as the certificate holder's employees and contract personnel for emergency maintenance and servicing.

(1) Part 91, § 91.1433; part 121, § 121.375; and part 135, § 135.433 are similar in that each certificate holder or person who performs maintenance shall have a training program. The training program ensures that each person, including inspection personnel, is fully informed about procedures, techniques, new equipment in use and is competent to perform the applicable duties.

(2) Part 91, § 91.1429(a); part 121, § 121.371(a); and part 135, § 135.429(a) are similar in that no person may use any person to perform required inspections unless the person performing the inspections is appropriately certificated, properly trained, qualified, and authorized to do so.

**NOTE: 14 CFR part 1 defines a "person" as an individual, firm, partnership, corporation, company, association, joint-stock association, or governmental unit.**

*D. Category II/III Maintenance Personnel Training.* Each applicant for Category II/III must establish an initial and recurrent training program. This program must be acceptable to the Administrator and cover all personnel performing quality control inspection and maintenance work on Category II/III airborne systems and equipment. Training records for such personnel are to be kept current and made available to the FAA for inspection.

*E. Recurrent Training.* The operator/program manager/applicant's training program should ensure that deficiencies discovered through continuous

analysis and surveillance are corrected during recurrent training. Fractional ownership program manager's personnel who are responsible for maintenance are required to receive annual training. Additionally, recurrent training should include at least the following:

- Review, reinforcement, and upgrade of all training given in both indoctrination and technical subjects
- Input from maintenance bulletins and/or maintenance newsletters
- Critical tasks, such as run-up/taxi, Required Inspection Items (RII), and Non-destructive Inspection (NDI)

*F. Training Records.* Training records must be retained by the operator/program manager/applicant to document that personnel are adequately trained. Training records should be maintained at a central location, but may be maintained at other locations provided these locations are listed in the operator/program manager/applicant's manual.

*G. Special Emphasis Training.* Special maintenance/inspection training programs are required when new or different types of aircraft and/or equipment are introduced.

*H. Fractional Ownership Training Requirements.* Fractional ownership programs require aircraft-specific technical training for those persons who are responsible for maintenance. This training is intended for persons within the fractional ownership program who oversee and/or schedule maintenance and inspections and are responsible for creating or amending the manager's inspection or maintenance program(s). The training, which is required both initially and annually (recurrent), ensures that those personnel are technically knowledgeable of the aircraft. This specific training requirement does not extend to the persons performing the maintenance. However, all maintenance personnel must still meet the requirements of the applicable regulations, such as 14 CFR parts 43, 65, and 145.

*I. Fractional Ownership CAMP.* Program managers who maintain their aircraft in accordance with a CAMP have additional training requirements. Section 91.1433 requires that the program manager, or person performing maintenance for the program manager, have a training program. This program must

ensure that each person, including inspection personnel, who determines the adequacy of work performed is fully informed about the procedures, techniques, and new equipment in use and is competent to perform the work. Section 91.1429 also requires that any person who performs required inspections be properly trained. This is in addition to their certification, authorization, and qualification requirements.

**7. ACCEPTING THE MAINTENANCE/INSPECTION TRAINING PROGRAM.** The task of acceptance differs from approval in that no specific procedure or vehicle is used to accept a training program. The program is approved by the general manager upon FAA acceptance. A list of effective pages will show acceptance dates of the maintenance/inspection training program.

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## SECTION 2. PROCEDURES

### 1. PREREQUISITES AND COORDINATION REQUIREMENTS.

#### A. Prerequisites:

- Knowledge of the regulatory requirements of parts 91 (subpart K), 121, and/or 135
- Successful completion of the Airworthiness Inspector Indoctrination course(s), or equivalent
- Familiarity with the type of operation being evaluated

B. *Coordination.* This task requires coordination with maintenance, avionics, and regional specialists.

### 2. REFERENCES, FORMS, AND JOB AIDS.

#### A. References:

- Section 604 of Title 49 of the United States Code (49 U.S.C.)
- 14 CFR parts 65, 91 (subpart K), 121, 135, and 145
- Title 49 of the Code of Federal Regulations (49 CFR) part 173
- ATOS Element : 4.2.1

#### B. Forms. None.

#### C. Job Aids:

- JTA: 3.3.20

### 3. PROCEDURES.

#### A. Review Operator/Program Manager File.

B. *Review Schedule of Events.* If this task is performed as part of an original certification or issuance of MSpecs, review the Schedule of Events to ensure that this task can be accomplished in accordance with the schedule.

C. *Review Maintenance/RII Training Programs.* The program should include the following elements in both the maintenance training program and the RII training program.

(1) The name of the person responsible for the overall administration of the maintenance/RII training program.

(2) The name(s) of the person(s) responsible for other processes within the maintenance/RII training program (e.g., recordkeeping, revisions to training programs, and security of the program).

(3) Designated maintenance/RII training instructors.

(4) A description of how instructors are determined to be qualified.

(5) Procedures used to authorize instructors.

(6) A file on the instructors consisting of qualifications, authorizations, and other documents pertaining to instructor assignments.

(7) A list describing what type of training is required for new employees or RII candidates (indoctrination, OJT, etc.).

(8) Procedures for evaluating, crediting, and documenting a new employee's previous training.

(9) Procedures for determining what additional training is required for a new employee.

(10) A schedule for recurrent training, a description of recurrent training, and procedures for determining requirements for other training.

(11) Recordkeeping procedures, including records of the following:

- Training dates
- Who performed the training (instructor should indicate by signing)
- The number of hours of training performed
- The content of the training performed

(12) Criteria for determining the quality of the training program (training standards).

(13) Evaluation of the need to revise training programs.

(14) A training syllabus that describes the following:

- Content of each training course
- Format of training (classroom, OJT)
- Duration of training courses
- Standards for grading students
- Training aids

(15) Criteria to determine acceptability of contract training, to include:

- Qualifications of instructors
- Criteria to establish appropriateness of reference material being taught
- Reporting procedures to inform the operator/program manager of student progress
- Criteria to determine adequacy of facilities
- Criteria to evaluate contractor's training syllabus

*D. Review RII Training.* The operator/program manager/applicant must provide RII original and recurrent training, including:

(1) A statement that RII students are appropriately certificated, qualified, trained, authorized, and current as airframe and/or powerplant mechanics or appropriately-certificated repairmen;

**NOTE: Part 91, subpart K does not allow repairmen to be used for RII purposes.**

(2) A method for notifying the RII candidate of the successful completion of the course; and

(3) A method for receiving confirmation by the candidate of acceptance of RII authorizations and responsibilities.

*E. Observe Operator/Program Manager/Applicant Performing Training.* This observation is performed regardless of whether the operator/program manager performs the training or contracts with another company.

(1) Ensure that facilities are adequate, including classrooms, training aids, and reference materials.

(2) Evaluate the instructor's presentation and knowledge.

(3) Ensure that course content and instruction is in accordance with the training syllabus.

(4) Ensure that training recordkeeping is performed in accordance with the maintenance/RII inspection program.

*F. Analyze Findings.* Evaluate all deficiencies to determine what changes will be required.

*G. Debrief the Operator/Program Manager/Applicant.*

(1) If deficiencies are discovered during the review, return the program to the operator/program manager/applicant with a letter describing the problem areas, if necessary. If this review is being performed as part of a certification, inform the operator/program manager/applicant that issuance of the certificate will be withheld until deficiencies are corrected.

(2) Schedule a meeting with the operator/program manager/applicant to discuss the problem areas if it may be helpful in resolving deficiencies. Discuss how to resolve deficiencies.

#### 4. TASK OUTCOMES.

*A. Complete PTRS.*

*B. Complete the Task.* Successful completion of this task will result in the following:

(1) A letter to the operator/program manager/applicant indicating acceptance of the program; and

(2) The original accepted program sent to the operator/program manager/applicant along with instructions to provide a copy of the program to the certificate-holding district office.

*C. Document Task.* File all supporting paperwork in the operator/program manager/applicant's file.

5. **FUTURE ACTIVITIES.** Normal surveillance.